



Checking Account No. XXXX261                      \$6,344.56 available

4.        On the date of service and on the date of this answer, the Bank was not indebted to, nor had any effects belonging to FRANKLIN BARRETT SECHRIEST.

5.        The Bank denies knowledge of any other persons indebted to, or possessing effects belonging to FRANKLIN BARRETT SECHRIEST.

6.        Checking account number XXXX261, referenced above is in the name of "FRANKLIN BARRETT SECHRIEST."

7.        The Bank has engaged an attorney to represent it in this proceeding. The Bank has contracted to pay reasonable attorney fees which to date total \$1,500.00, as well as costs, which the Bank is entitled to recover in accordance with Texas Rule of Civil Procedure 677, as well as an amount to be determined contingent upon an appeal to the Court of Appeals and an appeal to the Supreme Court.

WHEREFORE, the Bank requests:

a.        That all claims to the amounts owed to FRANKLIN BARRETT SECHRIEST, be determined and adjudicated, and that the Bank be discharged from all liability to FRANKLIN BARRETT SECHRIEST;

b.        That the Bank recover its costs and expenses, including reasonable attorney fees, and further awards of reasonable attorney fees in the event appeal is taken; and

c.        For such other relief to which the Bank may show itself justly entitled.

Respectfully submitted,

**WALSH MCGURK CORDOVA NIXON, PLLC**

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**ATTORNEYS FOR TEXAS REGIONAL BANK**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above and foregoing instrument was forwarded by certified mail, return receipt requested, to the following counsel of record on this the 2<sup>nd</sup> day of January, 2025.

**Via E-Service**

Jaime Esparza  
United States Attorney

**Via E-Service**

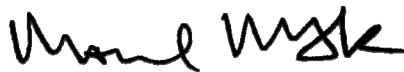
Steven E. Seward  
Assistant United States Attorney

**Via CMRRR #9589 0710 5270 0173 5442 16**

Franklin Barrett Sechriest  
Reg. No. 74266-509  
USP Tucson  
U.S. Penitentiary  
P.O. Box 24550  
Tucson, AZ 85734

**Via CMRRR #9589 0710 5270 0173 5442 23**

Financial Litigation Unit  
ASAO-WDTX  
Attn: AUSA Steven E. Seward  
601 N.W. Loop 410, Suite 600  
San Antonio, TX 78216



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Michael A. McGurk